

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

| | | |
|---------------------------------|---|---------------------------|
| IN RE: Melissa Maldonado |) | Case No: 18-08029 |
| |) | Judge: Schmetterer |
| |) | Chapter 13 |
| Debtor(s). |) | Trustee: Vaughn |

NOTICE OF MOTION

TO: Melissa Maldonado, 1041 Hiawatha Drive, Elgin, IL 60120
(served via U.S. Mail)
Office of U.S. Trustee, 219 S. Dearborn St., Suite 873, Chicago, IL 60604
(served electronically)
Office of Tom Vaughn, Chapter 13 Trustee, 55 E. Monroe Street Suite 3850
Chicago, IL 60603 (served electronically)
See also attached service list (served via U.S. Mail)

PLEASE TAKE NOTICE that on the 4th day of December, 2019, at 10:00 A.M.
or as soon thereafter as I may be heard, I shall appear before the Honorable Judge
Schmetterer or any other Bankruptcy Judge presiding in his or her place in Courtroom
682 of the Dirksen Federal Building located at 219 S. Dearborn, Chicago, IL, on the
attached Debtor's Motion to Modify the Plan Post-Confirmation, and shall request that
the attached Order be entered, at which time you may appear if so desired.

PROOF OF SERVICE

The undersigned does hereby certify that a copy of this Notice and Motion was
mailed to the above persons, at their respective addresses, postage prepaid, by depositing
in the U.S. Mail at 1305 Remington Road, Suite C, Schaumburg, IL 60173, before 6:00
p.m. on or before November 13, 2019.

/s/ John P. Carlin
John P. Carlin ARDC #6277222
Chang & Carlin, LLP
1305 Remington Road. Suite C
Schaumburg, IL 60173
(847) 843-8600

Barclays Bank Delaware
Att: collections dept
P.O. Box 8833
Wilmington, DE 19899

Barclays Bank Delaware
100 S West St
Wilmington, DE 19801

Bmo Harris Bank
Po Box 1111
Madison, WI 53701

Capital One
P.O. Box 60024
City Of Industry, CA 91716-0024

Capital One
Attn: General Correspondence/Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Citibank / Sears
Citicorp Credit Services/Attn: Centraliz
Po Box 790040
Saint Louis, MO 63179

Comenity Bank
PO BOX 965060
Orlando, FL 32896

Comenity Bank/vctrssec
PO Box 182273
Columbus, OH 43218

Comenity Bank/Victoria Secret
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218

Comenitycapital/dvdsbr
Comenity Bank
Po Box 182125
Columbus, OH 43218

Comenitycb/ulta Mc
Po Box 182120
Columbus, OH 43218

Kohls/Capital One
Kohls Credit
Po Box 3043
Milwaukee, WI 53201

Macys
Po Box 9001094
Louisville, KY 40290-1094

Sears/cbna
Po Box 6282
Sioux Falls, SD 57117

Syncb/car Care Pep B
Po Box 96060
Orlando, FL 32896

Syncb/PLCC
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank
PO Box 960061
Orlando, FL 32896-0061

Synchrony Bank
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/Care Credit
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/Sams
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/Select Comfort
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/TJX
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/Walmart
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Target
Target Card Services
Mail Stop NCB-0461
Minneapolis, MN 55440

Visa Dept Store National Bank/Macy's
Attn: Bankruptcy
Po Box 8053
Mason, OH 45040

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Motion to Modify Chapter 13 Plan Post Confirmation

NOW COMES, Melissa Maldonado, (hereinafter referred to as “Debtor”), by and through her attorney John P. Carlin and moves this Honorable Court for entry of an Order Modifying the Debtor’s Chapter 13 Plan Post Confirmation. In support thereof, Debtor respectfully represents as follows:

1. On March 20, 2018 the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 Plan on February 23, 2011. The Plan, as confirmed, provided for monthly payments of \$240 for forty-eight (48) months, with unsecured creditors receiving 10% of their timely filed claims.
3. At this point, Debtor is able to give more of a contribution for her creditors.
4. A snapshot of the current income shows Debtor is netting approximately \$865 per month and the non filing spouse is netting approximately \$2968 per month. See Exhibit A and B.
5. Under 11 U.S.C. §1329, Debtor is seeking to modify her plan to pay a \$350 per month payment beginning in December, 2019 through the remainder of the life of the Chapter 13 Plan.

WHEREFORE, DEBTOR prays that this Honorable Court enter an order:

1. Modifying the Chapter 13 plan post-confirmation, pursuant to 11 U.S.C. §1329 to raise the Plan payment to \$350 per month beginning December, 2019 to the end of the plan, while paying general unsecured creditors a minimum of 10%.
2. Any other relief that this Court deems just and fit.

Respectfully Submitted,

/s/ John P. Carlin

John P. Carlin #6277222

Attorney for the Debtor

Suburban Legal Group, PC

1305 Remington Road, Suite C

Schaumburg, Il 60173

847-843-8600